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8 *Counsel for Class Representative Steven Ganz*
And Indirect Purchaser Plaintiffs

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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 In re: CATHODE RAY TUBE (CRT)
15 ANTITRUST LITIGATION.

Master File No. 3:07-cv-5944 JST

MDL No. 1917

16 This Document Relates to:

**COOPER & KIRKHAM P.C.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

17 All Indirect-Purchaser Actions

Judge: Honorable Jon S. Tigar

Before: Special Master Martin Quinn, JAMS

[Declaration of John D. Bogdanov and
[Proposed] Order filed concurrently herewith]

1 Having reviewed and complied with the Honorable Jon S. Tigar's Standing Order
 2 Governing Administrative Motions to File Materials Under Seal and Civil Local Rule 79-5,
 3 Cooper & Kirkham, P.C. ("C&K") respectfully requests an Order permitting it to file under seal
 4 Exhibits 1-6 attached to the Second Declaration of Josef D. Cooper in Support of Cooper &
 5 Kirkham, P.C.'s Objection to Lead Counsel's Revised Proposed Allocation of Aggregate Fee
 6 Award to Indirect Purchaser Plaintiffs' Counsel.

7 This motion is supported by the Declaration of John D. Bogdanov in Support of Cooper &
 8 Kirkham, P.C.'s Motion to File Under Seal, filed concurrently herewith.

9 Specifically, C&K requests that the following portions be sealed: Exhibits 1-6 to the
 10 Second Declaration of Josef D. Cooper in Support of Cooper & Kirkham, P.C.'s Objection to
 11 Lead Counsel's Revised Proposed Allocation of Aggregate Fee Award to Indirect Purchaser
 12 Plaintiffs' Counsel.

13 C&K requests that the entirely of the exhibits listed above be sealed because those portions
 14 contain discussion, analysis, or references to documents or information designated by Lead
 15 Counsel for the Indirect Purchaser Plaintiffs as "Highly Confidential" pursuant to the terms of the
 16 Stipulated Protective Order (Dkt. 306), as set forth in the Declaration of John D. Bogdanov in
 17 Support of Cooper & Kirkham, P.C.'s Administrative Motion to File Under Seal. Civil Local
 18 Rule 79-5 provides that if a party wishes to file a document that has been designated by another
 19 party, or if a party wishes to refer in a memorandum to information so designated by another
 20 party, the submitting party must file an administrative motion to seal and the designating party
 21 must file a declaration within four days of filing the administrative motion to seal establishing that
 22 the designated material is sealable. Civil L.R. 79-5(e). It is the designating party's burden to
 23 establish that the designate information is sealable. Civil L.R. 79-5(d); *see Kamakana v. City of*
Honolulu, 447 F.3d 1172, 1178-1180 (9th Cir. 2006).

25 Thus, C&K respectfully submits this administrative motion pursuant to the Protective
 26 Order, the Honorable Jon S. Tigar's Standing Order Governing Administrative Motions to File
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1 Under Seal, and Civil Local Rules 7-11 and 79-5(d), and hereby notified the Designating Parties
2 of their burden to establish that the designated material is sealable.

3 A proposed order granting this application is enclosed.

4 Dated: September 23, 2016

Respectfully submitted,

5 /s/ Josef D. Cooper
6 Josef D. Cooper

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